



Lawrence S. Lustberg

Gibbons P.C.
One Gateway Center
Newark, NJ 07102-5310
Direct: 973-596-4731
llustberg@gibbonslaw.com

October 10, 2023

VIA ECF

Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 23A
New York, New York 10007

Re: *United States of America v. Menendez, et al.,*
Dkt. No. 23-cr-490-SHS

Dear Judge Stein:

This firm represents defendant Wael Hana in the above-captioned matter. Mr. Hana was arraigned and released on bail two weeks ago, under the conditions that he take certain actions to secure his bond, including transferring \$300,000 and pledging all of his shares in Capital Management GE LLC by today. *See* ECF No. 15. Due to financing issues that would have resulted from this pledge, we proposed to the Government and the Office of Pretrial Services that Capital Management EG LLC be replaced with Henry Street Plaza LLC. Both the Government and Pretrial Services graciously indicated that they have no objection to the substitution of this property for Capital Management GE LLC.

For the Court's convenience, we have enclosed a proposed form of order and a copy of the executed agreement to forfeit property with respect to Henry Street Plaza LLC. Should the Court require any additional information, please do not hesitate to contact me. We thank the Court for its time and kind consideration of this matter.

Respectfully submitted,

s/ Lawrence S. Lustberg
Lawrence S. Lustberg

cc: All counsel of record (via ECF)